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4-8-2015

April 8, 2015

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Office of Air, Waste & Toxics

**Subject: April 2015 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the March 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from March 16, 2014, to April 8, 2015.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period with two wells extracting groundwater (EW-2 and EW-4). No high-alarms were received during the month.
- Data from the First Quarter 2015 was received and is in the process of being validated.
- The Baxter team met with EPA on March 23, 2015. A summary of the Chemical Oxidation Bench Study was provided along with a discussion regarding the performance of the recirculation system. It was agreed that Chem Ox was not a feasible technology in the source area. EPA also agreed that the recirculation system works well for cutting off the source area based on significant reductions in the shallow plume downgradient of the recirculation system. The intermediate plume does not appear to be changing and therefore, Baxter proposed installing iSOCs to aerate the plume and enhance aerobic biodegradation of the PCP. The following action items came out of the discussion:
 - EPA is amenable to reducing the reporting requirements for the Remedial Action Pilot Study. Baxter will prepare a letter request.
 - EPA is amenable to reducing the amount of monitoring because many of the wells have been consistently non-detect and there is little value in continued quarterly sampling. Baxter will prepare a letter request with justification for a reduction in monitoring.
 - Baxter will assess the recirculation system in April/early May and prepare a focused work plan including installation of iSOCs into 3 intermediate wells and rehabilitation of the recirculation trench. The work plan is expected to be submitted by early June with the rehabilitation and iSOC installation to occur after EPA's approval of the work plan.



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ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system during the next reporting period; however, until the system is rehabilitated, it is expected that its performance will continue to be below optimum.
- Baxter will conduct a site visit to assess the recirculation systems and associated extraction wells. The wells where the iSOCs will be installed will also be examined to ensure that the plans for installation of the iSOCs are viable.
- Baxter will prepare a work plan for installation of the iSOCs and rehabilitation of the recirculation system. It is anticipated to be submitted to EPA in early June.
- Baxter will coordinate with EPA to determine the delivery of the First Quarter 2015 data submittal; whether it will be submitted as a quarterly report, or a data submittal associated with a Progress Report.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Analytical Data for First Quarter 2015 was received and is in the process of being validated.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

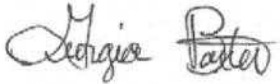
Signature:

Name: Georgia Baxter
Title: Chief Executive Officer
Date: April 8, 2015



We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group





WA3019
14 F
3-15-2015

March 15, 2015

Received

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

MAR 19 2015

Office of Air, Waste & Toxics

**Subject: March 2015 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the February 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from January 16, 2014, to February 15, 2015.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period with two wells extracting groundwater (EW-2 and EW-4). The only extraction wells operating at the beginning of the fourth quarter in 2014 were EW-2 and EW-4. All of the extraction wells were turned on at the beginning of the fourth quarter 2014, but each extraction well, except EW-2 and EW-4, was triggered almost immediately to shut down because of its high-water-level alarm.
- In February during the First Quarter 2015 sampling event, the Baxter sampling team turned on all wells again, with similar results.
- The System Alarm Communication (Frontier) was transferred from AMEC to GSI Water Solutions in early March 2015. No high-water-level alarm notices were received by the AMEC team after the wells were restarted in February. Therefore, we can assume that wells EW-2 and EW-4 continue to extract groundwater.
- The PCP concentration in groundwater at MW-3 increased from 7.6 ug/L to 720 ug/L. This concentration is higher than has been observed in the past 2 years; however, the concentrations at this location show a wide range in concentrations; such as in 2008, the PCP concentration in that well ranged from <0.16 to 2,400 ug/L. However, since the infiltration trench system has been operating, concentrations, while still varying widely, have generally declined and therefore, we will keep an eye on this well as it may be related to the biofouling of the system.

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ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system during the next reporting period; however, until the system is rehabilitated, it is expected that its performance will continue to be below optimum.
- A meeting with EPA is scheduled for March 23, 2015 to discuss the results of the Chem-Ox Bench Scale Test and determine a path forward regarding the existing infiltration trench pilot study. The infiltration trench, and perhaps associated extractions wells and piping, has biofouled and will need to be remediated to function at its capacity.
- Baxter will submit the Fourth Quarter 2014 Operations and Monitoring Report in March 2015.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Fourth Quarter Analytical results will be reported in the Fourth Quarter 2014 Operations and Monitoring Report scheduled for delivery in March 2015.
- In response to comments on the Third Quarter 2014 Report:
 - PCP in groundwater from MW-29 decreased from 170 ug/L to 44 ug/L, which is still elevated relative to the first 2 quarters in 2014 but lower than the 99 ug/L detected in Fourth quarter 2014.
 - PCP in MW-41 decreased from 410 ug/L to 350 ug/L which is consistent with previous concentrations.
 - The EW-composite (wells EW-1 through EW-4) concentration decreased from 790 ug/L to 590 ug/L which is within the range in concentrations over the past 2 years. The pages in the appendix will be numbered for ease in locating and referring to in comments and other communications.
 - The water elevation reported for June 2014 at MW-39 (96.94 feet NAVD88) appears to be erroneous. Perhaps it was an error in the field reading of the measuring tape. There have been 2 water level events since which both show the groundwater elevation to be consistent with historic elevations at just over 105 feet NAVD88.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure



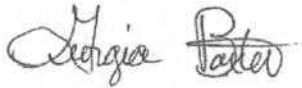
that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name: Georgia Baxter
Title: Chief Executive Officer
Date: February 15, 2015

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group





February 15, 2015

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

WA 3019
14 F
Received 2/15/15
FEB 18 2015
Office of Air, Waste & Toxics

**Subject: February 2015 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the January 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from January 16, 2014, to February 15, 2015.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system during the next reporting period.
- Baxter will submit the Fourth Quarter 2014 Operations and Monitoring Report in March 2015.
- Meet with EPA to discuss Bench Scale Oxidation Test Results and proposed path forward

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the



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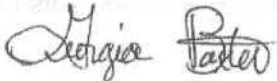
information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name: Georgia Baxter
Title: Chief Executive Officer
Date: February 15, 2015

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group





WA3019
14 F
1-20-15

January 20, 2015

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

**Subject: January 2015 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the December 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from December 15, 2014, to January 15, 2015.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- On December 21, 2014, Baxter submitted to EPA the Third Quarter 2014 Operations and Monitoring Report.
- On December 29, 2014, Baxter submitted to EPA the 2014 Stand Alone Data Document (SADD).

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system during the next reporting period.
- Baxter will submit the Fourth Quarter 2014 Operations and Monitoring Report in March 2015.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.



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CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name: Georgia Baxter
Title: Chief Executive Officer
Date: January 20, 2015

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group

